



ILLINOIS SNAP ENROLLMENTS CONTINUE TO FALL AS HR 1 TAKES EFFECT



CIVIC FEDERATION

Authored by Paula R. Worthington

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TABLE OF CONTENTS

EXECUTIVE SUMMARY 2

SNAP ENROLLMENT 3

ADULT WORK REQUIREMENTS AND TIME LIMITS 4

POLICY CHANGES AND IMPACTS ON CHILDREN 7

 DIRECT SNAP ENROLLMENT OF CHILDREN 7

 COMMUNITY ELIGIBILITY 9

LOOMING FISCAL PENALTIES UNDER H.R. 1 11

IMPACTS ON THE VULNERABLE 12

CONCLUSION 13

REFERENCES 13

EXECUTIVE SUMMARY

The USDA's Supplemental Nutrition Assistance Program (SNAP) is changing rapidly as H.R. 1's provisions take effect.¹ Program enrollments are dropping nationwide, and states are under increasing pressure to implement H.R. 1's additional work requirements and improve program administration, with significant future financial penalties for states whose payment error rates remain elevated.

We now have updated data through July 2026 that allows early examination of enrollment trends since federal policy changes took effect, particularly the February 1 date at which work requirements and time limit rules changed for some SNAP enrollees. Based on that data, we share updated enrollments with a special focus on two particularly vulnerable groups: near-elderly adults ages 55-64 and children up to 17 years of age. We also revise our estimate of future financial penalties for the State if its payment error rate does not come down.

Key findings include:

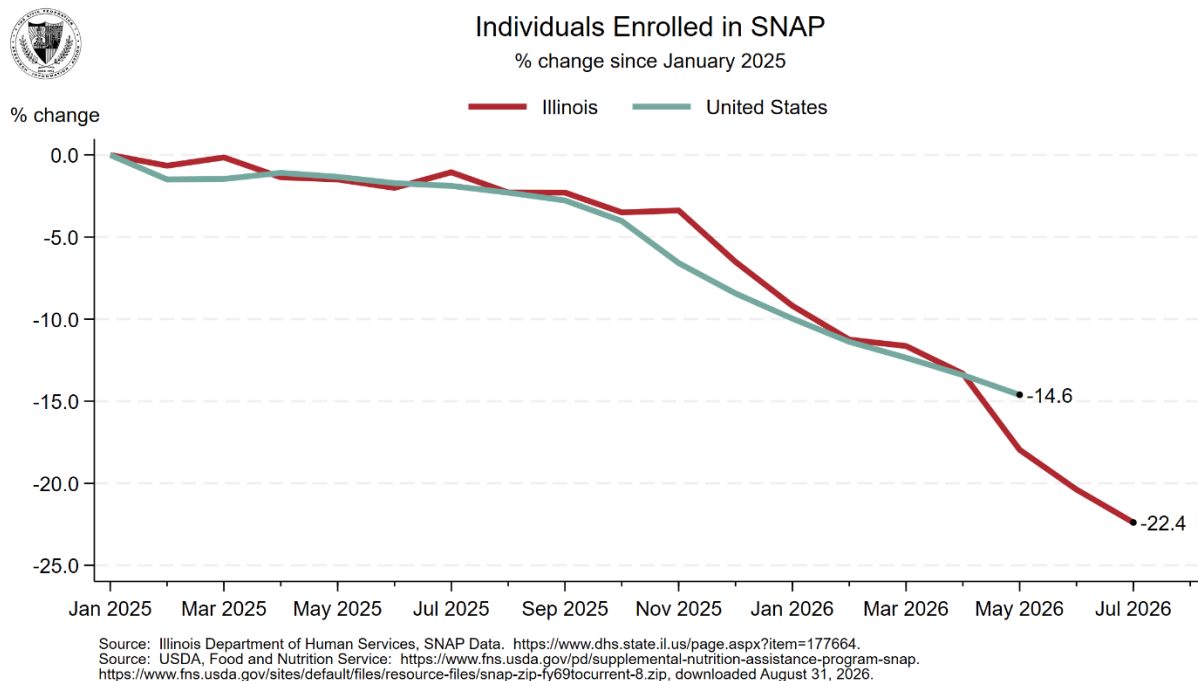
- **Enrollment:** SNAP enrollment declined in July to 1.48 million individuals in Illinois, far below the COVID-era peak of 2.1 million, and only 83.4% of January 2020 enrollments. Since January 2025, enrollment has fallen 22.4%.
- **Working age adults:** Data from the Illinois Department of Human Services suggest that H.R. 1's expanded work requirements may be driving some of the observed enrollment decreases among adults. From October 2025 through June 2026, enrollment declines among working age adults—ages 18 to 64—have been much sharper than those for children and the elderly. Given the limited evidence that displaced adult enrollees will find employment at similar levels, this highlights the need to manage any increased food and nutrition needs in this group—especially the near elderly, ages 55 to 64, who may find it especially difficult to find employment.
- **Children:** Nearly 100,000 children ages 0 to 17 have fallen off the SNAP rolls in Illinois since October 2025—a decline of 14.0%. Children of school age may also feel H.R. 1 impacts via decreased future federal reimbursements to schools for providing school lunches and breakfasts. Chicago Public Schools included over \$200 million in its 2025-2026 budget in such reimbursements.
- **Looming fiscal impacts:** The Civic Federation estimated Illinois's annual potential financial penalties at nearly \$550 million as of July 2026, due to the State's elevated payment error rate, which was 14.67% in FY 2025.² Continued sharp enrollment declines and modest decreases in the average monthly benefit per enrollee now point to an annual fiscal cost of just under \$500 million starting in federal fiscal year (FFY) 2029.

¹Lily Padula, *Understanding H.R. 1: How New Federal Rules Could Reshape SNAP in Illinois* (Civic Federation, 2025), [link](#).

²Paula R. Worthington, *Illinois Fails to Lower SNAP Payment Error Rates Targeted by H.R. 1*, July 9, 2026, [link](#).

SNAP ENROLLMENT

Nationwide, SNAP enrollment fell to 36.56 million in May 2026 (latest available), as rolls shrank faster in recent months than in the first half of 2025. Illinois SNAP enrollment fell to 1.48 million in July, also reflecting sharper enrollment decreases in recent months. Recent declines in enrollment have been faster and sharper in Illinois than in the national as a whole: since January 2025, US enrollments are down 14.6% (through May 2026), while Illinois's enrollments are down 22.4% (through July 2026):



Detailed monthly data from October 2025 through June 2026 shows that enrollment decreases vary considerably by age group.³ We find that enrollment of the elderly (ages 65 and up) is basically unchanged; enrollment of children has fallen 14.0%; and enrollment of working age adults ages 18 to 64 has fallen by nearly a quarter at 24.8%. Below, we explore how H.R. 1's provisions can help to interpret these differences.

³We thank the Illinois Department of Human Services for sharing these detailed data and providing comments on an earlier draft of this report.

ADULT WORK REQUIREMENTS AND TIME LIMITS

Adult SNAP participants are subject to a variety of work requirements and time limits on the receipt of benefits.⁴ General work requirements apply to participants ages 16-59, with exemptions available to individuals who are already working 30 hours/week, taking care of young children, or studying at least half-time, and to those unable to work due to physical or mental limitations. Able-bodied adults ages 18-54 without dependents (“ABAWDs”) face additional requirements: absent individual exemptions, ABAWDs must work 80 hours per month to maintain program eligibility. ABAWDs who do not meet the work requirements are limited to receiving only three months of SNAP benefits every three years.

States, too, have long had the ability to file requests with the USDA to temporarily waive the time limits restrictions when labor markets were weak. Prior to H.R. 1, states could request waivers for the entire states or selected areas (for example, selected counties) if the unemployment rate exceeded 10 percent or if the relevant area lacked sufficient jobs.⁵ Historically, Illinois has taken full advantage of this provision, seeking and receiving partial or state-wide waivers since 1996, when time limits were first enacted into law as part of overall welfare reform.⁶ In fact, just prior to the COVID pandemic, in the first quarter of federal FY2020 (October 2019-December 2019), Illinois was one of 32 states with partial waivers in place; one year later, as the pandemic drove large though transitory spikes in unemployment nationwide, Illinois was one of 25 states with statewide waivers. By the first quarter of federal FY2026, Illinois was only one of six states with statewide waivers in place.

H.R. 1 significantly altered both the groups of adults subject to the ABAWD work requirements and time limits and the “lack of sufficient jobs” criterion for approval of waiver requests from states.

- H.R. 1 expanded the ABAWD category to include adults ages 55 to 64. These “near elderly” adults would now face the same work requirements and time limits previously faced by ABAWDs between 18 and 54 years of age.
- H.R. 1 also removed the ability of states to rely on the “insufficient jobs” criterion when applying for waivers from the ABAWD work requirements and time limits. Guidance provided by the USDA ultimately led to the expiration—and non-renewal—of Illinois’s

⁴Food and Nutrition Administration, “SNAP Work Requirements,” July 16, 2026, [link](#).

⁵States often relied heavily on the latter criterion, providing evidence that their unemployment rate was at least 20% higher than the US rate based on a 24-month moving average basis. In the COVID era, states like Illinois also qualified for exemptions based on their eligibility for extended unemployment benefits. See Lauren Bauer and Diane Schanzenbach, “SNAP Cuts in the One Big Beautiful Bill Act Will Significantly Impair Recession Response,” *Brookings*, October 8, 2025, [link](#).

⁶Illinois Attorney General, *202001-30 PROTECT FOOD STAMP BENEFITS FOR NEARLY 700K AMERICANS* (2020), [link](#).

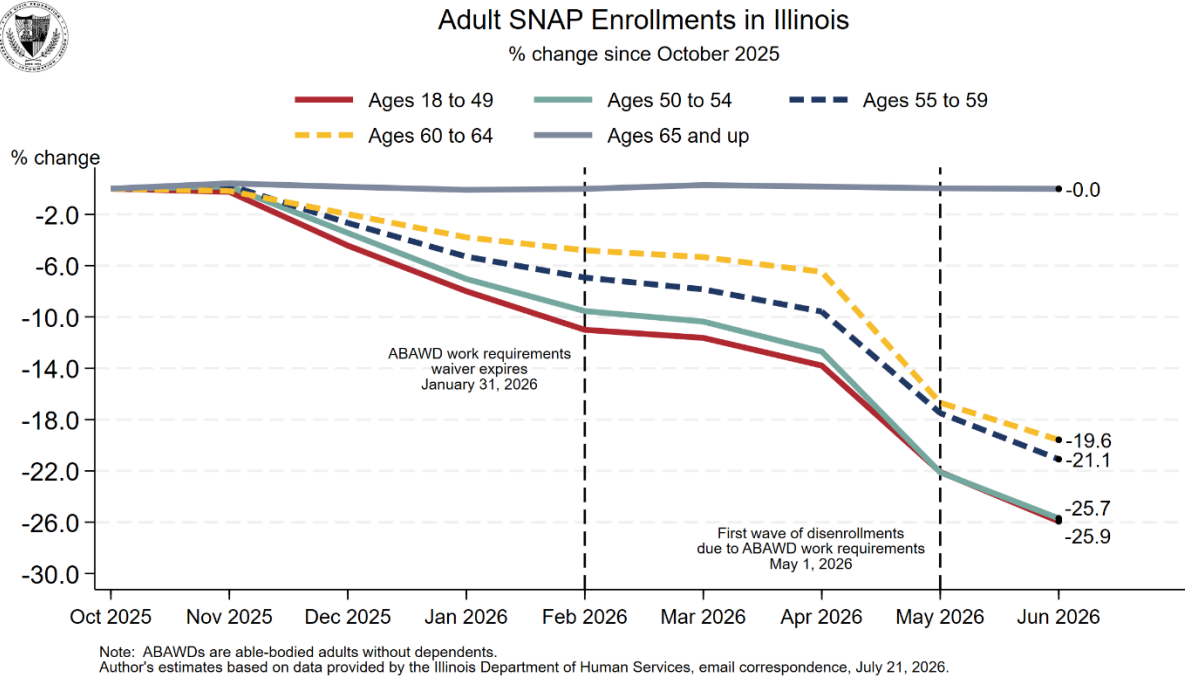
most recent statewide waiver, which had been in effect since February 2025.⁷ That waiver, which allowed the State to avoid enforcing the ABAWD work requirements and time limits, ended on January 31, 2026. At that point, the three-month clock started for all ABAWDs without individual exemptions, meaning that non-compliance with work requirements would lead to disenrollment after three months.

The waiver's expiration meant that Illinois would, for the first time in 30 years, enforce ABAWD work requirements and time limits statewide for all ABAWDs ages 18 to 64. These impacts appear evident in monthly data through June 2026: since October 2025, enrollment declines among working-age adults have been much sharper than those in the 65 and older category.⁸

- Over those eight months, enrollments fell by 25.9% and 25.7%, respectively, for the youngest working-age adults, ages 18 to 49 and 50 to 54, respectively.
- For those groups newly included as ABAWDs—hence newly subject to HR 1's work requirements—enrollment fell 21.1% among 55 to 59 year olds and 19.6% among 60 to 64 year olds.
- Among elderly adults 65 and older, enrollments have been basically flat.
- The clear drop-off in May 2026 is only evident for non-elderly adults—those under age 65. Elderly adults, who are not subject to work requirements, do not show any discontinuity in May.

⁷Sasha Gersten-Paal, "RE: Supplemental Nutrition Assistance Program (SNAP) – Illinois Request to Waive Able-Bodied Adults Without Dependents Time Limit – Initial – Partial Approval," March 14, 2025, [link](#); Food and Nutrition Service, "Supplemental Nutrition Assistance Program (SNAP) - Waiver of the Time Limit - Status Update," February 26, 2026.

⁸These data are for all adults in the relevant age groups and may include non-ABAWDs—that is, adults of working age who are disabled, unable to work because of dependent care responsibilities, and so on.



How many of these recently disenrolled individuals are now working? In a nutshell, we expect that employment impacts stemming from work requirements may be quite limited: recently reviewed evidence suggests that work requirements do not increase employment but do, in fact, drive large decreases in participation in SNAP.⁹

For older adults in particular, expected employment gains may be especially limited.¹⁰

- *Low employment rates:* In the general population, adults ages 55 to 64 have far lower employment rates than younger adults. For the US as a whole, the employment rate of the near elderly was 64.5% in July 2026;¹¹ in contrast, adults ages 25 to 54 had an employment rate of 80.4%.¹²
- *Low labor force participation rates:* Illinois Department of Employment Security (IDES) data shows that labor force (LF) participation rates for adults ages 55 to 64, while rising gently since 2025, remain far lower than corresponding rates for 45 to 54 year olds: in

⁹Lauren Bauer and Chloe N. East, *A Primer on SNAP Work Requirements* (Brookings Institution, 2026), [link](#).

¹⁰Age group definitions vary across data sources, so we explicitly state these definitions as we use them.

¹¹Organisation for Economic and Cooperative Development, "OECD Data Explorer • Infra-Annual Labour Statistics," September 7, 2026, [link](#).

¹²Jennifer Schramm, "July 2026 Employment Data Digest," AARP, August 7, 2026, [link](#).

July 2026, the LF participation rate of the near elderly was 71.4%, 12.6 percentage points lower than that of the 45 to 54 year old age group.¹³

Furthermore—and unsurprisingly—among SNAP participants, employment rates are far lower than for the general population, with even wider gaps between the elderly and non-elderly: in FFY 2024 (latest available), the employment rate of non-elderly adults without a disability was 37.1%, while that of elderly adults (60+) was 5.7%.¹⁴ Employment of non-elderly adults with disabilities was even lower at 4.8%. Given that nearly one-half of SNAP participants ages 50 to 59 were estimated to have a disability in FFY 2023,¹⁵ expecting significant increases in employment in the near-elderly seems too optimistic.

On balance, then these data suggest that the dramatic declines in SNAP enrollment among working age adults—especially the near elderly—is unlikely to be accompanied by employment gains of similar magnitude.

POLICY CHANGES AND IMPACTS ON CHILDREN

The SNAP program supports children in two key ways: via direct support, when a child's household is enrolled in SNAP, and via indirect support, when a child attends a school participating in the Community Eligibility Provision (CEP), which allows eligible schools to offer free breakfast and lunch to all students regardless of income level.¹⁶

DIRECT SNAP ENROLLMENT OF CHILDREN

It is not obvious exactly how H.R. 1's changes to work requirements and time limits should affect enrollment of children. Some analysts have argued that H.R. 1's future cost-sharing provisions may give states incentives to decrease enrollment across the board—including children.¹⁷ More specifically, if a child's parent fails to comply with any new work requirements,

¹³Illinois Department of Employment Security, "Illinois Labor Force Participation Rates," August 18, 2026, [link](#).

¹⁴Ben Ward and Mia Monkovic, *Characteristics of Supplemental Nutrition Assistance Program Households: Fiscal Year 2024*, SNAP-24-CHAR (United States Department of Agriculture, 2026), 78.

¹⁵Olivia Dean and Ari Houser, *Over 10 Million Households With Adults Ages 50 and Older Participated in the Supplemental Nutrition Assistance Program (SNAP) in Fiscal Year 2023* (2025), 3, [link](#).

¹⁶SNAP enrollments can also affect various measures of economic disadvantage used by states to allocate other extra aid to schools; we leave that topic for future analysis. Emily Gutierrez, *Federal Safety Net Reforms and School Funding Formulas: When Policy Changes but Need Persists* (Urban Institute, 2026), 3, [link](#).

¹⁷Bauer and Schanzenbach, "SNAP Cuts in the One Big Beautiful Bill Act Will Significantly Impair Recession Response."

the parent may be disenrolled, but the child—and the household—may remain eligible, driving individual enrollments down more than household enrollments.¹⁸

Children from birth to age 17 accounted for 38.8% of all SNAP participants nationwide in federal FY 2024, the latest year available.¹⁹ To date, available data point to significant declines in child enrollment since H.R. 1's enactment: for 25 states with available data, 1.2 million children have dropped off the rolls, about a 13% decline.²⁰

In Illinois, children 17 and under accounted for 38.0% of enrollees in federal FY 2024.²¹ More recent monthly data from IDHS indicate that children comprised 692,493, or 37.6% of all SNAP participants in October 2025. By June 2026, child enrollment had fallen to 595,421 and accounted for 39.2% of all enrollees. The IDHS data also show that Illinois enrollments have fallen less for children than for working-age adults since October 2025. Between October 2025 and June 2026, enrollments fell:

- 13.4% for children ages 0 to 13
- 16.5% for children ages 14 to 17
- And 24.8% for adults 18 to 64, with little change for adults ages 65 and up.

Enrollments of older children (ages 14 to 17) did fall more than those of younger children, but the difference is not large and does not seem to be widening. If the gap does grow, that may suggest that in Illinois, some households with older children are dropping off the rolls, perhaps reflecting H.R. 1's expansion of work requirements to parents of older children.

¹⁸For parents of older minor children, H.R. 1 removed an exemption from its work requirements so that parents of children 14 to 17 (but no younger children) are now subject to work requirements. If a parent is removed from SNAP, children may still remain in the program; so the number of households does not change, but the number of individual recipients—or the average number of individuals per household—will go down, as may monthly benefit amounts. Benefits are typically adjusted to reflect any decrease in the number of eligible individuals in the household; benefits may also depend on the reported income of any ineligible household members.

¹⁹ Ward and Monokovic, *Characteristics of Supplemental Nutrition Assistance Program Households: Fiscal Year 2024*, 28.

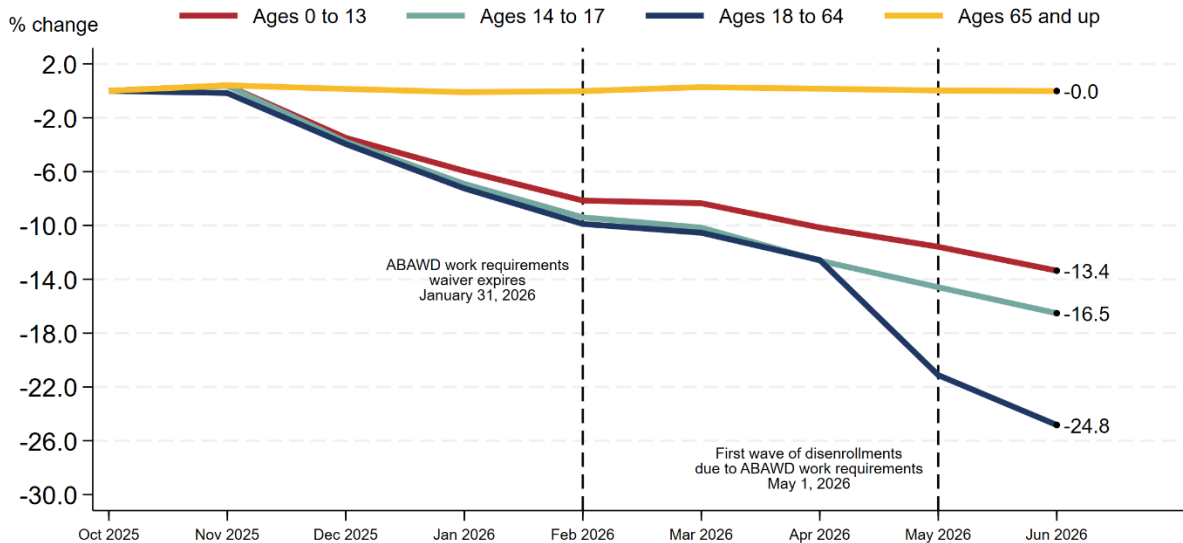
²⁰Catlin Nchako and Joseph Llobrera, *With School Year Starting, Children's Participation in SNAP Continues Rapid Decline*, September 8, 2026, [link](#).

²¹Ward and Monokovic, *Characteristics of Supplemental Nutrition Assistance Program Households: Fiscal Year 2024*, 106.



SNAP Enrollments in Illinois

% change since October 2025



Note: ABAWDs are able-bodied adults without dependents.

Author's estimates based on data provided by the Illinois Department of Human Services, email correspondence, July 21, 2026.

COMMUNITY ELIGIBILITY

Beyond SNAP itself, the federal government supports food and nutritional needs of children via school lunch and breakfast programs. Students whose families meet income requirements qualify for free or reduced price meals, and H.R. 1 did not change those programs or supports.²² However, changes in SNAP enrollments may cause indirect effects via USDA's Community Eligibility Provision (CEP), which makes it easier (less expensive) for schools to offer free meals to all their students. In a nutshell, falling child SNAP enrollments may make it harder for schools to participate in CEP and/or may decrease federal reimbursements to schools for meals served, increasing the fiscal needs of schools.

Under CEP, school districts with large shares of needy students—called “identified students” may choose to enroll individual schools, groups of schools, or even the entire district's schools in this program, allowing participating schools to offer free breakfast and lunch to all students, requiring no applications, income verifications, and so on. Students whose families receive SNAP or TANF benefits are included, as are some recipients of Medicaid benefits and those directly certified via other means (e.g., enrolled in a Head Start program). Schools are reimbursed on a per meal basis, with larger reimbursements for schools with higher identified student percentages (ISPs). The share of meals reimbursed at the highest level—the federal

²²Kara Clifford Billings, *FY2025 Budget Reconciliation: Implications for USDA's Child Nutrition Efforts*, no. IN12629 (Congressional Research Service, 2025).

free reimbursement rate²³—is calculated as 1.6 times the ISP but is capped at 100%, so that schools (or groups of schools, or districts) with ISPs above 62.5% continue to receive the highest federal reimbursements for 100% of meals served.

The CEP program is a significant source of nutrition support for the nation’s school children:

- 27.6 million children nationwide attended schools in the CEP program in the 2025-2026 school year.²⁴
- In the state of Illinois, the corresponding numbers are 941,155 students at 2,346 schools.²⁵

Even small changes in SNAP enrollments may cause changes in ISPs, leading to changes in the federal reimbursements schools rely on to cover the expenses of their food and nutrition programs. Recently, for example, Miami-Dade County schools announced the end of its “district wide” provision of free meals to students, leaving 121 (of 500+) schools with universal free meals, with students at other schools required to apply individually for free meals.²⁶

Locally, Chicago Public Schools participates in the CEP program district-wide, and its 2025-2026 budget included over \$200 million in federal meal reimbursements, most of which was for school breakfasts and lunches.²⁷ Because the District’s ISP equals or exceeds 62.5%, the District receives the highest possible federal reimbursements for meals served. H.R. 1 potentially threatens those reimbursements by leading to decreased SNAP enrollments, hence downward pressure on the ISP—hence, the District’s ability to qualify for the maximum federal meal reimbursements.

Based on available data, we think CPS’s reimbursement risks are limited, but they deserve monitoring going forward. An example shows why:

- We do not know the District’s ISP; we only know it equals or exceeds 62.5%, at which point the share of meals reimbursed at the highest level is capped at 100%.²⁸

²³Federal reimbursements in the contiguous states vary by meal: for the 2026-2027 school year, for example, \$0.45 for paid lunch meals in non-high needs schools, compared to \$5.02 for free lunches in high-needs schools Food and Nutrition Administration, “National School Lunch, Special Milk, and School Breakfast Programs, National Average Payments/Maximum Reimbursement Rate,” *Federal Register* 91 FR 43957 (July 2026), [link](#).

²⁴Erin K. Hysom, *Community Eligibility: The Key to Hunger-Free Schools* (Food Research and Action Center, 2026), 2, [link](#).

²⁵Food Research and Action Center, “Community Eligibility (CEP) Database,” n.d., accessed September 14, 2026, [link](#).

²⁶Kevin Hardy, “SNAP Cuts Could Lead to Kids Losing Free School Breakfast and Lunch,” *Stateline*, September 1, 2026, [link](#).

²⁷Chicago Public Schools, “Interactive Dashboards: Chicago Public Schools Fiscal Year 2026,” n.d., accessed September 16, 2026, [link](#); Chicago Public Schools, *Revenue 2027*, September 2026, [link](#).

²⁸Food Research and Action Center, “Community Eligibility (CEP) Database.”

- Suppose the District's true ISP is 10 percentage points higher than the 62.5% threshold—say, 72.5%. That figure seems consistent with the District's statement that roughly 7 in 10 of its students come from economically disadvantaged households.²⁹
- At a "true" ISP of 72.5%, the District would have a "cushion" of about 31,622 CPS student SNAP enrollees, meaning student SNAP enrollment could fall by nearly 32K students without damaging the District's ability to participate in CEP and claim the maximum reimbursements.³⁰ In other words, CPS student participation in SNAP, TANF, or the other possible "pathways" would have to drop by about 32K students to affect federal reimbursements for school breakfasts and lunches.

That said, statewide SNAP enrollment of children has declined significantly since October 2025—by nearly 100,000 children ages 0 to 17. Furthermore, other "pathways" via TANF or Medicaid receipt may also be narrowing due to other H.R. 1 provisions. The bottom line for now: no immediate crisis for CPS in terms of funding its food and nutritional programs, but the issue bears watching in the future.

LOOMING FISCAL PENALTIES UNDER H.R. 1

H.R. 1 established benefits cost-sharing requirements that penalize states with high payment error rates (PERs).³¹ Based on enrollments through May 2026, average monthly benefits per enrollee, and Illinois's FY2025 payment error rate of 14.67%, we estimated the State's fiscal costs to be just under \$550 million, down from earlier estimates of over \$700 million because SNAP enrollment has declined considerably since January 2025.³² With even lower enrollments and a modest decrease in monthly benefits per enrollee, the Civic Federation has revised our estimate to be just under \$500 million, effective in FFY 2029.

Linking cost-sharing rates to PERs gives states incentives to improve program administration and decrease error rates, in part by limiting enrollments and re-enrollments—or even discontinuing the program entirely.³³ In other words, we might expect states with the highest PERs (hence, those with the most to lose from penalty cost-sharing rates) to experience the

²⁹Chicago Public Schools, *Budget Overview 2026*, 2025, [link](#).

³⁰At 2025-2026 enrollment of 316,224, 10% of students is 31,622. See Chicago Public Schools, "Stats and Facts," 2025, [link](#).

³¹Per H.R. 1, states with PERs below 6% will have no cost sharing; those with PERs between 6% and 8% will face a cost share of 5%; those with PERs between 8% and 10% will face a cost share of 10%; and those with PERs above 10% will face the highest cost share of 15%.

³² Worthington, *Illinois Fails to Lower SNAP Payment Error Rates Targeted by H.R. 1*.

³³It is worth remembering that "wrongly rejecting an eligible applicant is not considered an error"; see Bauer and Schanzenbach, "SNAP Cuts in the One Big Beautiful Bill Act Will Significantly Impair Recession Response."

largest enrollment declines. While the early evidence on such incentive effects is fairly weak³⁴, states can and must increase the efficiency and accuracy of their program administration.³⁵

Because of implementation delays included in the legislation, the earliest Illinois would face these additional costs is FFY 2029, or October 2028. Some observers have called for even further delays—or elimination of the cost-sharing provisions entirely—, but others have argued for keeping the provisions intact.³⁶ Illinois must focus on improved program administration even if, at the eleventh hour, fiscal penalties are delayed or pared back.

IMPACTS ON THE VULNERABLE

Dropping participants from the SNAP rolls does not necessarily eliminate their need for food assistance, particularly if employment and income gains are limited. Instead, affected households may increasingly turn to the nonprofit sector for support.³⁷ In fact, anecdotal evidence confirms this shift is underway, as food pantries face increasing demand, reflecting elevated food prices and decreased public support via SNAP.^{38 39}

Chicago-area survey results from spring 2026—even before H.R. 1’s impacts were becoming more evident—highlight the crucial role of SNAP in addressing food and nutrition needs: over half of food insecure households received SNAP benefits at that time.⁴⁰ Many such households turn to the nonprofit sector for additional assistance, and those demands are increasing: local food pantries report increased visits⁴¹, and some programs have long waiting lists.⁴²

Furthermore, this report has highlighted key demographic groups likely to need additional support as SNAP participation falls: adults subject to work requirements and time limits, and children.

³⁴ Kevin Corinth, *Paying for Payment Errors: State Incentives and Caseload Responses to SNAP Cost Sharing* (American Enterprise Institute, 2026), [link](#).

³⁵ Joe Ferguson, “Illinois Can’t Afford to Get SNAP Wrong,” *The Daily Line*, July 9, 2026, [link](#).

³⁶ Angela Rachidi, *Why Congress Shouldn’t Change SNAP’s New Payment Error Approach*, September 2, 2026, [link](#).

³⁷ Judith Crown, “How Federal Changes to SNAP Threaten Illinois’ Food System,” Crain’s Forum on State and Local Food Policy, *Crain’s Chicago Business*, August 25, 2025, [link](#).

³⁸ Mike Stafford, “Policy Blog: Evolution of SNAP Participation and Charitable Food Demand in Central Pennsylvania,” *Central Pennsylvania Food Bank*, May 26, 2026, [link](#).

³⁹ Julieanna Jackson, “SNAP Enrollment Drops as Texas Food Banks Face Rising Demand,” *KCENTV.COM*, May 14, 2026, [link](#).

⁴⁰ Greater Chicago Food Depository, *2026 Hunger in Chicago Report* (2026), 21, [link](#).

⁴¹ Greater Chicago Food Depository, *2026 Hunger in Chicago Report*, 21; Elvia Malagón, “Illinois Sees 16% Drop in SNAP Enrollment 1 Year after Food Program Overhaul,” *Chicago Sun-Times*, July 27, 2026, [link](#).

⁴² Elvia Malagón, “New Report Finds 35% of Chicago Households Don’t Have Sufficient Food,” *Chicago Sun-Times*, September 14, 2026, [link](#).

- Declines in SNAP enrollment for near-elderly adults reveal a group likely to need additional support. These adults ages 55 to 64 may be in poorer health and may face deficits in skills, education, and/or work experience, all relative to other non-elderly adults. It will be important for policymakers to monitor the well-being of this group in particular going forward, potentially targeting them for non-SNAP forms of assistance where available.
- Declining SNAP enrollment of children present dual challenges: one, children leaving the SNAP rolls may face direct and negative impacts on food security; and two, schools may find it harder and more expensive to offer free meals under the CEP, leading to fewer students receiving such meals and/or financial pressures on schools to pay for those meals.

CONCLUSION

As intended by Congress, SNAP enrollments are falling, as is anticipated total spending on the program.⁴³ For Illinois, the fiscal implications cut in opposite directions. Lower enrollment reduces the State's potential exposure to future benefit cost-sharing penalties, even as Illinois could still face nearly \$500 million in future annual costs if its payment error rate remains elevated. At the same time, declining enrollment means less federal food assistance reaching vulnerable Illinois households. The State therefore faces two related challenges: improving SNAP administration enough to reduce its fiscal exposure while closely monitoring the food security and financial well-being of those losing assistance—especially children and those near-elderly adults especially unlikely to transition to employment.

REFERENCES

- Bauer, Lauren, and Chloe N. East. *A Primer on SNAP Work Requirements*. Brookings Institution, 2026. https://www.hamiltonproject.org/wp-content/uploads/2025/04/20260409_THP_SNAPWorkRequirements_Paper.pdf.
- Bauer, Lauren, and Diane Schanzenbach. "SNAP Cuts in the One Big Beautiful Bill Act Will Significantly Impair Recession Response." *Brookings*, October 8, 2025. <https://www.brookings.edu/articles/snap-cuts-in-the-one-big-beautiful-bill-act-will-significantly-impair-recession-response/>.
- Billings, Kara Clifford. *FY2025 Budget Reconciliation: Implications for USDA's Child Nutrition Efforts*. No. IN12629. Congressional Research Service, 2025.
- Chicago Public Schools. *Budget Overview 2026*. 2025. <https://www.cps.edu/about/finance/budget/budget-2026/budget-overview-2026/>.

⁴³Editorial Board, "The Food Stamp Reform Is Working," Opinion, *Wall Street Journal*, September 2, 2026, [link](#).

- Chicago Public Schools. "Interactive Dashboards: Chicago Public Schools Fiscal Year 2026." n.d. Accessed September 16, 2026. <https://biportal.cps.edu/analytics/saw.dll?Dashboard>.
- Chicago Public Schools. *Revenue 2027*. September 2026. <https://www.cps.edu/about/finance/budget/budget-2027/revenue-2027/>.
- Chicago Public Schools. "Stats and Facts." 2025. <https://www.cps.edu/about/stats-facts/>.
- Corinth, Kevin. *Paying for Payment Errors: State Incentives and Caseload Responses to SNAP Cost Sharing*. American Enterprise Institute, 2026. <https://www.aei.org/wp-content/uploads/2026/07/Corinth-2026-State-Incentives-and-Caseload-Responses-to-SNAP-Cost-Sharing.pdf?x68881>.
- Crown, Judith. "How Federal Changes to SNAP Threaten Illinois' Food System." Crain's Forum on State and Local Food Policy. *Crain's Chicago Business*, August 25, 2025. <https://www.chicagobusiness.com/craains-forum-state-and-local-food-policy/snap-changes-expected-shake-illinois-food-system>.
- Dean, Olivia, and Ari Houser. *Over 10 Million Households With Adults Ages 50 and Older Participated in the Supplemental Nutrition Assistance Program (SNAP) in Fiscal Year 2023*. 2025. <https://www.aarp.org/content/dam/aarp/ppi/topics/health/food-insecurity/over-10-million-households-adults-ages-50-older-participated-supplemental-nutrition-assistance-program-snap-fiscal-year-2023.doi.10.26419-2fppi.00106.004.pdf>.
- Editorial Board. "The Food Stamp Reform Is Working." Opinion. *Wall Street Journal*, September 2, 2026. <https://www.wsj.com/opinion/food-stamp-reform-gop-welfare-benefits-congress-63221a37>.
- Ferguson, Joe. "Illinois Can't Afford to Get SNAP Wrong." *The Daily Line*, July 9, 2026. <https://www.thedailyline.com/illinois-cant-afford-to-get-snap-wrong>.
- Food and Nutrition Administration. "National School Lunch, Special Milk, and School Breakfast Programs, National Average Payments/Maximum Reimbursement Rate." *Federal Register* 91 FR 43957 (July 2026). <https://www.federalregister.gov/documents/2026/07/16/2026-14252/national-school-lunch-special-milk-and-school-breakfast-programs-national-average-paymentsmaximum>.
- Food and Nutrition Administration. "SNAP Work Requirements." July 16, 2026. <https://www.fna.usda.gov/snap/work-requirements>.
- Food Research and Action Center. "Community Eligibility (CEP) Database." n.d. Accessed September 14, 2026. <https://frac.org/research/resource-library/community-eligibility-cep-database>.
- Gersten-Paal, Sasha. "RE: Supplemental Nutrition Assistance Program (SNAP) – Illinois Request to Waive Able-Bodied Adults Without Dependents Time Limit – Initial – Partial Approval." March 14, 2025. <https://fna->

bwbufwdzbabpezgc.z01.azurefd.us/sites/default/files/resource-files/il-abawd-response-fy2025-b.pdf.

Greater Chicago Food Depository. *2026 Hunger in Chicago Report*. 2026.
https://www.chicagosfoodbank.org/wp-content/uploads/2026/09/The-2026-Hunger-in-Chicago-Report_download.pdf.

Gutierrez, Emily. *Federal Safety Net Reforms and School Funding Formulas: When Policy Changes but Need Persists*. Urban Institute, 2026.
<https://www.urban.org/research/publication/federal-safety-net-reforms-and-school-funding-formulas>.

Hardy, Kevin. "SNAP Cuts Could Lead to Kids Losing Free School Breakfast and Lunch." *Stateline*, September 1, 2026. <https://stateline.org/2026/09/01/snap-cuts-could-lead-to-kids-losing-free-school-breakfast-and-lunch/>.

Hysom, Erin K. *Community Eligibility: The Key to Hunger-Free Schools*. Food Research and Action Center, 2026. <https://frac.org/wp-content/uploads/CEP-Report-2026.pdf>.

Illinois Attorney General. *202001-30 PROTECT FOOD STAMP BENEFITS FOR NEARLY 700K AMERICANS*. 2020. <https://illinoisattorneygeneral.gov/dA/a97284192c/202001-30%20PROTECT%20FOOD%20STAMP%20BENEFITS%20FOR%20NEARLY%20700K%20AMERICANS.pdf>.

Illinois Department of Employment Security. "Illinois Labor Force Participation Rates." August 18, 2026.
https://ides.illinois.gov/content/dam/soi/en/web/ides/labor_market_information/local_area_unemploymentstatisticslaus/ILCPS_eprate_12moavg.xlsx.

Jackson, Julieanna. "SNAP Enrollment Drops as Texas Food Banks Face Rising Demand." *KCENTV.COM*, May 14, 2026. <https://www.kcentv.com/article/news/local/snap-enrollment-drops-texas-food-banks-face-rising-demand/500-9bb34159-4f83-44eb-b40c-b826f5f2175e>.

Malagón, Elvia. "Illinois Sees 16% Drop in SNAP Enrollment 1 Year after Food Program Overhaul." *Chicago Sun-Times*, July 27, 2026.
<https://chicago.suntimes.com/news/2026/07/27/illinois-sees-16-drop-in-snap-enrollment-one-year-after-food-program-overhaul>.

Malagón, Elvia. "New Report Finds 35% of Chicago Households Don't Have Sufficient Food." *Chicago Sun-Times*, September 14, 2026.
<https://chicago.suntimes.com/health/2026/09/14/new-report-finds-35-of-chicago-households-dont-have-sufficient-food>.

Nchako, Catlin, and Joseph Llobrera. *With School Year Starting, Children's Participation in SNAP Continues Rapid Decline*. September 8, 2026. <https://www.cbpp.org/blog/with-school-year-starting-childrens-participation-in-snap-continues-rapid-decline>.

Organisation for Economic and Cooperative Development. "OECD Data Explorer • Infra-Annual Labour Statistics." September 7, 2026. [https://data-explorer.oecd.org/vis?df\[ds\]=DisseminateFinalDMZ&df\[id\]=DSD_LFS%40DF_IALFS_INDIC&df\[ag\]=OECD.SDD.TPS&dq=.UNE_LF_M...Y..T.Y_GE15..M&lom=LASTNPERIODS&lo=13&to\[TIME_PERIOD\]=false](https://data-explorer.oecd.org/vis?df[ds]=DisseminateFinalDMZ&df[id]=DSD_LFS%40DF_IALFS_INDIC&df[ag]=OECD.SDD.TPS&dq=.UNE_LF_M...Y..T.Y_GE15..M&lom=LASTNPERIODS&lo=13&to[TIME_PERIOD]=false).

Padula, Lily. *Understanding H.R. 1: How New Federal Rules Could Reshape SNAP in Illinois*. Civic Federation, 2025. <https://www.civiced.org/Federal-Impacts-SNAP-in-Illinois>.

Rachidi, Angela. *Why Congress Shouldn't Change SNAP's New Payment Error Approach*. September 2, 2026. <https://www.aei.org/opportunity-social-mobility/why-congress-shouldnt-change-snaps-new-payment-error-approach/>.

Schramm, Jennifer. "July 2026 Employment Data Digest." *AARP*, August 7, 2026. <https://www.aarp.org/pri/topics/work-finances-retirement/employers-workforce/employment-data-digest/>.

Stafford, Mike. "Policy Blog: Evolution of SNAP Participation and Charitable Food Demand in Central Pennsylvania." *Central Pennsylvania Food Bank*, May 26, 2026. <https://www.centralpafoodbank.org/policyblog-may2026-2/>.

Ward, Ben, and Mia Monkovic. *Characteristics of Supplemental Nutrition Assistance Program Households: Fiscal Year 2024*. SNAP-24-CHAR. United States Department of Agriculture, 2026.

Worthington, Paula R. *Illinois Fails to Lower SNAP Payment Error Rates Targeted by H.R. 1*. July 9, 2026. <https://civiced.org/blog/illinois-fails-lower-snap-payment-error-rates-targeted-hr-1>.